

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

THE CHESTER COUNTY HOSPITAL	:	CIVIL ACTION
	:	NO. 02-2746
v.	:	
	:	
INDEPENDENCE BLUE CROSS,	:	
QCC INSURANCE COMPANY,	:	
KEYSTONE HEALTH PLAN EAST, and	:	
KEYSTONE MERCY HEALTH PLAN	:	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL ITS
JOINT RESPONSE TO NON-PARTY AETNA INC.'S APPEAL OF
THE COURT'S JULY 7, 2003 AND JULY 16, 2003 ORDERS
MODIFYING THE JANUARY 24, 2003 PROTECTIVE ORDER AND TO
MULTIPLAN'S STATEMENT OF OBJECTIONS AND/OR NOTICE OF APPEAL
FROM THE MAGISTRATE JUDGE'S ORDER DENYING MULTIPLAN'S
MOTION TO INTERVENE AND/OR MOTION FOR PROTECTIVE ORDER
(DOC. NO. 54) AND MOTION TO QUASH, MOTION TO INTERVENE
AND/OR MOTION FOR PROTECTIVE ORDER (DOC. NO. 83)**

Plaintiff The Chester County Hospital, by its attorneys, respectfully files this Motion for Leave to file under seal Its Joint Response to Non-Party Aetna Inc.'s Appeal of The Court's July 7, 2003 and July 16, 2003 Orders Modifying the January 24, 2003 Protective Order and to Multiplan's Statement of Objections and/or Notice of Appeal From the Magistrate Judge's Order Denying Multiplan's Motion to Intervene and/or Motion for Protective Order (Doc. No. 54) and Motion to Quash, Motion to Intervene and/or Motion for Protective Order (Doc. No. 83). Plaintiff's Motion contains information designated confidential under the Court's January 24, 2003 Protective Order. Therefore, pursuant to the terms of the January 24, 2003 Protective Order, Plaintiff respectfully Moves to file under seal Its Joint Response to Non-Party Aetna Inc.'s Appeal of The Court's July 7, 2003 and July 16, 2003 Orders Modifying the January 24, 2003 Protective Order and to Multiplan's Statement of Objections and/or Notice of Appeal From the Magistrate Judge's Order Denying

Multiplan's Motion to Intervene and/or Motion for Protective Order (Doc. No. 54) and Motion to Quash, Motion to Intervene and/or Motion for Protective Order (Doc. No. 83) .

Respectfully Submitted,

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ORDER

AND NOW, on this _____ day of _____, 2003, upon consideration of Plaintiff The Chester County Hospital's Motion for Leave to File Under Seal Its Joint Response to Non-Party Aetna Inc.'s Appeal of The Court's July 7, 2003 and July 16, 2003 Orders Modifying the January 24, 2003 Protective Order and to Multiplan's Statement of Objections and/or Notice of Appeal From the Magistrate Judge's Order Denying Multiplan's Motion to Intervene and/or Motion for Protective Order (Doc. No. 54) and Motion to Quash, Motion to Intervene and/or Motion for Protective Order (Doc. No. 83), it is hereby ORDERED that the Motion is GRANTED.

BY THE COURT:

JOHN R. PADOVA
UNITED STATES DISTRICT JUDGE